

May 16, 2002

Ms. Marlene H. Dortch  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C.

Dear Ms. Dortch:

***Re: Ex Parte*** Presentation  
**ET Docket No. 00-258; RM-9920; RM-9911**

On May 15, 2002, Robert Roche, Vice President for Policy and Research, CTIA, had a phone conversation with William Lane, Chief Technologist, Policy Division of the Wireless Telecommunications Bureau, to respond to certain questions regarding reference data relevant to spectrum requirements in the advanced mobile services proceeding.

Dr. Roche indicated that UMTS cell sizes (and other assumptions) are spelled-out in UMTS Forum Report No. 6, which is available from the UMTS Forum's website, at [http://www.ums-forum.org/reports\\_r.html](http://www.ums-forum.org/reports_r.html). He indicated that data regarding central business district density can be found on the Demographia website run by Wendell Cox (see <http://www.demographia.com>). In particular, New York City central business district density can be found at <http://www.demographia.com/db-nycbd.htm>. Per this site, the downtown central business district is defined as "Generally all area south of Chambers Street/Read Street" and the midtown central business district is defined as "2nd Avenue to 8th Avenue, 34th Street to 59th Street." Demographia also has data on Chicago central business district density, which can be found at <http://www.demographia.com/db-chicbd.htm>. The boundaries of the different Chicago business districts are also specified at this page. Comparative data on U.S. and international cities by central business district employment density appears at <http://www.demographia.com/db-intlcbbdens.htm>.

Recent data on penetration in major urban markets in the U.S. may be found on the website for Scarborough Research. See, for example, the table released on March 18, 2002 appearing at [http://www.scarborough.com/scarb2002/press/pr\\_cellphone\\_data.htm](http://www.scarborough.com/scarb2002/press/pr_cellphone_data.htm) which shows Chicago at 67 percent penetration.

CTIA's semi-annual collection of data regarding the wireless industry only proceeds on a nationwide, aggregate level. It does not have data segregated by carrier or by market. Carriers submit their data in aggregate form, i.e., one submission per company. CTIA has a total number of cell sites reported to it, plus total subscribership, and so can derive an industry average subscribers-per-cell site figure, but it is a national average. Thus, for example, using mid-year 2001 data, it is possible to note that there

were 109,674,358 subscribers reported and 114,059 operational cell sites reported, for 962 subscribers-per-cell site on average. As a nationwide average, it undoubtedly differs from the number of subscribers-per-cell site experienced by carriers in differing markets on a site-by-site basis. CTIA does not have such carrier-specific or market-specific data.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

Robert Roche

Robert Roche

Cc: William Lane